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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

CELESTE BARRAS, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
HEALTHSOUTH MEDICAL CLINICS OF )  
ANCHORAGE, LLC & U.S. )  
HEALTHWORKS HOLDING CO., INC., )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case No. A05-0174-CV (JWS)

**DEFENDANTS' MOTION FOR TERMINATING SANCTIONS, OR ALTERNATIVELY,  
FOR AN ORDER BARRING INTRODUCTION OF EVIDENCE AND FOR ADDITIONAL  
MONETARY SANCTIONS FOR PLAINTIFF'S WILLFUL DISCOVERY VIOLATIONS**

Defendants HealthSouth Medical Clinics of Anchorage, LLC and U.S. Healthworks Holding Co. Inc. (collectively "Defendants"), by and through their counsel of record, hereby move pursuant to Federal Rule of Civil Procedure ("FRCP") 37(b)(2) and D. Ak. 37.1(a)-(b) for litigation-terminating sanctions in the form of an order dismissing Plaintiff Celeste

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Case No. A05-0174-CV (JWS)  
Defendants' Motion for Terminating Sanctions

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Barras' ("Barras") lawsuit for her willful and continuous discovery violations. In the event the Court declines to dismiss her lawsuit, Defendants move in the alternative for an order barring introduction of evidence not timely furnished during discovery and for further monetary sanctions.

DATED at Anchorage, Alaska, this 26<sup>th</sup> day of July 2006.

s/Patricia A. Vecera  
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**Certificate of Service**

I hereby certify that on July 26, 2006, a copy of the foregoing Defendants' Motion for Terminating Sanctions was served on M. Celeste Barras, 160 Ocean Park Drive, Anchorage AK 99515-3401, by regular U.S. mail.

s/Patricia A. Vecera

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